

REMARKS

The Office action mailed on 25 June 2004 (Paper No. 4) has been carefully considered.

The title of the invention is being changed, and the specification is being amended to correct minor errors and improve form. In addition, claims 1, 3 thru 7, 10, 11 and 15 thru 24 are being amended. Thus, claims 1 thru 24 are pending in the application.

On top of page 2 of the Office action, the Examiner objected to the title of the invention for not being descriptive. Accordingly, the title of the invention is being changed to "INTERNET INTERFACE SERVICE SYSTEM AND METHOD PROVIDING PUBLIC INTERNET ACCESS TO USERS CARRYING MOBILE TERMINALS". Thus, the objection to the title should no longer apply, and should be withdrawn.

In paragraph 1 of the Office action, the Examiner objected to Figure 4 of the drawings for including reference numeral S402 not described in the disclosure. Accordingly, paragraph [0029] of the specification is being amended to recite that the control unit 21 provides a dynamic IP address, referring to step S402 as set forth in Figure 4 of the drawings, as originally filed. Thus, paragraph [0029] of the specification is being amended merely for the purpose of achieving consistency with

Figure 4 of the drawings, specifically block S402. Thus, no “new matter” is being inserted into the specification. Moreover, the objection to Figure 4 of the drawings no longer applies, and should be withdrawn.

In paragraph 3 of the Office action, the Examiner rejected claims 1 thru 9 and 11 thru 24 under 35 U.S.C. §103 for alleged unpatentability over Jansen *et al.*, U.S. Patent No. 6,243,450 in view of Gupta *et al.*, U.S. Patent No. 6,487,538 and Massarani, U.S. Patent No. 6,393,484. In paragraph 14, the Examiner rejected claim 10 under 35 U.S.C. §103 for alleged unpatentability over Jansen *et al.* ‘450 in view of Massarani ‘484. For the reasons stated below, it is submitted that the invention recited in the claims, as now amended, is distinguishable from the prior art cited by the Examiner so as to preclude rejection under 35 U.S.C. §103.

Independent claims 1, 10 and 11 are being amended to recite an internet interface service system and method by means of which high-speed connection services are provided to mobile terminals carried by respective users in public places. Moreover, independent system claims 1 and 11 are being amended to recite that the system comprises, among other elements, plural interface units, one for each of the mobile terminals, for connecting the mobile terminals of the respective users to the internet network so as to provide the respective users with internet services. This corresponds to the disclosure of Figure 1, which shows a mobile terminal 10 and a corresponding interface unit 1 which connects the mobile terminal 10 to the internet network 5. As

mentioned in paragraph [0019] of the specification, the internet interface service system includes “plural interface units 1 (only one is shown for the sake of simplicity) connected to plural mobile terminals 10 (again, only one is shown)” (quoting from paragraph [0019], lines 2-4 of the specification). Thus, the specification supports the amended recitation of the “plural interface units”.

In paragraph 4 of the Office action, the Examiner states that Jansen *et al.* ‘450 discloses an internet interface service system which includes “plural interface units”, citing item 38 of Figure 2, and stating that a “plurality of terminals are connected to the Central server” (quoting from paragraph 4, lines 3-4 of the Office action). However, item 38 in Jansen *et al.* ‘450 is merely a collection of connection lines referred to as an “intranet” to which a plurality of vendor servers 27 are connected (*see* column 4, lines 3-4 of the patent). Thus, there is no disclosure or suggestion in Jansen *et al.* ‘450 of the plural interface units, one for each of the plurality of mobile terminals, as recited in independent system claims 1 and 11 of the present application, as now amended.

In paragraph 4 of the Office action, the Examiner also states that Jansen *et al.* ‘450 discloses a “plurality of terminals” connected to the Central server (*see* paragraph 4, lines 3-4 of the Office action). However, the system and method of independent claims 1, 10 and 11 is distinguishable from Jansen *et al.* ‘450 by virtue of the recitation of an internet interface service system and method which provides “high-speed connection services to mobile terminals carried by respective users in public places”

(quoting from the preamble of independent claims 1, 10 and 11, as amended). In contrast, Jansen *et al.* '450 actually teaches away from the concept of mobile terminals carried by respective users in public places by disclosing, in Figure 1, a permanently or semi-permanently fixed kiosk apparatus containing a computer 14, a display 16, a keyboard 18, a telephone 20, and speakers 43 and 45 to be used by any member of the public who is not carrying his/her own mobile terminal. Thus, not only is this apparatus a non-mobile terminal within the context of the recitation contained in the preamble of claims 1, 10 and 11, but also the apparatus shown in Jansen *et al.* '450 does not provide high-speed connection services to mobile terminals carried by respective users in public places, as recited in claims 1, 10 and 11, as amended.

At the top of page 3 of the Office action, the Examiner states that the terminals of Jansen *et al.* '450 "can be wirelessly located anywhere and therefore are considered mobile" (quoting from page 3, lines 1-2 of the Office action). Whereas the Examiner may be correct that, since the terminals can be wirelessly connected to the internet, they can be moved from one location to another. However, the terminals or kiosks disclosed in Jansen *et al.* '450 (*see* Figure 1, in particular) are clearly not "mobile terminals carried by respective users in public places", as recited in claims 1, 10 and 11, as amended. Thus, for this reason alone, the invention recited in the claims is distinguishable from the disclosure of Jansen *et al.* '450 so as to preclude rejection under 35 U.S.C. §103.

On page 3 of the Office action, the Examiner admits that Jansen *et al.* '450 "does not explicitly teach a central management server allocating dynamic IP addresses" as well as a "central management server being responsive to the mobile terminals receiving from the interface units a signal terminating the internet connections for releasing the dynamic IP addresses allocated to the mobile terminals" (quoting from the first complete paragraph on page 3 of the Office action). Therefore, the Examiner cites Gupta *et al.* '528 and Massarani '484. However, the Examiner does not state where, in the disclosure of Jansen *et al.* '450, there is any statement or motivation or instruction to a person of ordinary skill in the art, motivating or instructing that person to seek and incorporate the disclosures of Gupta *et al.* '528 and/or Massarani '484. Thus, on this additional basis, a rejection under 35 U.S.C. §103 based on the combination of references cited by the Examiner must be considered to be an invalid combination under the statute.

In addition, it should be noted that Gupta *et al.* '528 does not disclose or suggest, and the Examiner does not contend that it discloses or suggests, a central management server allocating dynamic IP addresses, the central management server being responsive to the mobile terminals receiving from the interface units a signal terminating the internet connections for releasing the dynamic IP addresses allocated to the mobile terminals, as recited in independent system claims 1 and 11.

Thus, the Examiner must be relying on Massarani '484 alone for allegedly

disclosing the latter feature of the present invention. However, again, there is no statement in the Office action as to where in Jansen *et al.* '450 there is any statement or disclosure which would motivate or instruct a person of ordinary skill in the art to seek the disclosure of Massarani '484, or to modify the disclosure of Jansen *et al.* '450 in accordance with the disclosure of Massarani '484 so as to arrive at the present invention, as claimed.

In the latter regard, it is noted that Figure 1 of Massarani '484 discloses a DHCP server 30 and an authentication server 36. Presumably, one or both these servers is alleged by the Examiner to perform the functions of dynamic IP address allocation and release of the dynamic IP addresses allocated to the mobile terminals upon termination of the internet connection, as recited in the claims. However, it is also noted that the arrangement of Figure 1 of Massarani '484 is entirely distinct and different from the arrangement of the central server generally disclosed in Figure 1 and specifically disclosed in Figure 3 of Jansen *et al.* '450. Thus, it is submitted that one of ordinary skill in the art, even if motivated to seek the disclosure of Massarani '484 for the purpose of modifying the disclosure of Jansen *et al.* '450, would not receive sufficient instruction from either of the two references so as to be able to incorporate the servers 30 and/or 36 of Massarani '484 into the kiosk apparatus arrangement of Figures 2 and 3 of Jansen *et al.* '450. Moreover, even if one of ordinary skill in the art were so instructed and motivated, it is not clear from the disclosures of the two patents, or from the Office action itself, that incorporation of the servers 30 and/or 36 of Massarani '484

into the arrangement of Jansen *et al.* '450 would result in the present invention, as recited in the claims. Thus, on this additional basis, a rejection under 35 U.S.C. §103 based on the combination of references cited by the Examiner must be considered improper, and should be withdrawn.

For the reasons stated above, it is submitted that the inventive system and method, as recited in claims 1, 10 and 11, is distinguishable from the prior art cited by the Examiner so as to preclude rejection under 35 U.S.C. §103.

The dependent claims of the present application provide a further basis for distinguishing the invention from the prior art cited. For example, dependent claims 3 and 15 recite that each interface unit comprises a first communication unit and a second communication unit with the functions recited in the claims. In paragraph 6 of the Office action, the Examiner cites element 104 of Figure 4 of Jansen *et al.* '450 as allegedly corresponding to the recited "first communication unit", and cites elements 46, 48 and 50 of Figure 3 of Jansen *et al.* '450 as allegedly corresponding to the recited "second communication unit". However, it should be recalled that, with respect to the recited "interface units", the Examiner (in paragraph 4 on page 2 of the Office action) stated that element 38 of Figure 2 of Jansen *et al.* '450 (entitled "intranet") corresponded to the recited "interface units". However, element 38 of Jansen *et al.* '450 appears (in Figure 2 thereof) to be merely communication lines external to, and interconnecting, kiosk terminals 10 to the servers 26 and 27. Furthermore, element 104

of Figure 4 of Jansen *et al.* '450 (which the Examiner states as corresponding to the recited "first communication unit") is an Ethernet interface 104 contained within the multimedia terminal itself (*see* Figure 4 of the patent), whereas claims 3 and 15 (and their preceding claims) make it clear that the interface units, which contain the first and second communication units, are separate and apart from the mobile terminals which they serve. In addition, elements 46, 47 and 50 of Figure 3 of Jansen *et al.* '450 (which, according to the Examiner, corresponds to the recited "second communication unit") are individual servers contained within the central server 26 (which, according to the Examiner, corresponds to the recited "central management server") of the claims. In contrast, the recited second communication unit resides in the interface unit which, according to the claims, is an element separate and apart from the central management server recited in the claims.

Further considering dependent claim 3, the Examiner states (on page 5 of the Office action) that the settlement unit recited in the claims corresponds to element 88 of Figure 4 of Jansen *et al.* '450. However, element 88 of Figure of the cited patent is an I/O element or interface contained within the multimedia terminal itself, whereas the settlement unit recited in dependent claim 3 is an element contained within the interface unit, which is an element separate and apart from the mobile terminal.

At the bottom of page 5 of the Office action, the Examiner alleges that element 82 of Jansen *et al.* '450 corresponds to the "control unit" recited in dependent claim 3.

However, element 82 of Figure 4 of the cited patent is a microprocessor contained within the multimedia terminal itself, whereas the recited "control unit" is a part of the interface unit which, according to the claims, is an element separate and apart from the mobile terminals.

It should be noted that the observations above relative to the settlement unit and control unit recited in dependent claim 3 apply also to the settlement unit recited in dependent claim 17 and the control unit recited in dependent claims 20 thru 24. Thus, for the same reasons stated above relative to dependent claim 3, dependent claims 17 and 20 thru 24 provide further basis for distinguishing the invention from the prior art cited by the Examiner so as to preclude rejection under 35 U.S.C. §103.

To summarize, the combination of references cited by the Examiner under 35 U.S.C. §103 does not disclose or suggest each and every element and function recited in independent claims 1, 10 and 11, as well as various dependent claims of the present application. Moreover, there is no statement in the references, or in the Office action, which would provide motivation or instruction to a person of ordinary skill in the art so as to enable that person to seek the secondary references in question, and incorporate those references into a modification of the primary reference so as to render obvious the claimed invention. For these reasons, a rejection under 35 U.S.C. §103 based on the cited combination of references should be considered improper, and should be withdrawn.

A corrected Figure 4 is being submitted herewith in order to correct a minor grammatical error in block S403 of Figure 4. Corrected formal Figure 4 which incorporates this amendment accompanies the Amendment. Entry of corrected formal Figure 4 and confirmation of that entry in writing in the next Office action are respectfully requested.

In view of the above, it is submitted that the claims of this application are in condition for allowance, and early issuance thereof is solicited. Should any questions remain unresolved, the Examiner is requested to telephone Applicant's attorney.

No fee is incurred by this Amendment.

Respectfully submitted,



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